

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MICHAEL ALEMAN-VALDIVIA and FREDDY SANCHEZ,  
individually and on behalf of all others similarly situated,

Civil Action No.  
1:20-cv-00421-LDH-PK

Plaintiffs,

-against-

TOP DOG PLUMBING & HEATING CORP., FIRST CHOICE  
PL, INC., VERONICA AZULAI, and RON MAIMON  
AZULAI,

Defendants.

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**DECLARATION OF KATHERINE MORALES IN SUPPORT OF  
PLAINTIFF'S MOTION FOR CONDITIONAL CERTIFICATION,  
COURT-AUTHORIZED NOTICE PURSUANT TO SECTION 216(b) OF THE FLSA,  
AND EXPEDITED DISCOVERY**

I, Katherine Morales, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an associate with Katz Melinger PLLC, attorneys for plaintiff Michael Aleman-Valdivia<sup>1</sup>, and I am familiar with all of the facts and circumstances of this action. I make this declaration in support of Plaintiff's Motion for Conditional Certification and Court-Authorized Notice Pursuant to Section 216(b) of the FLSA and Expedited Discovery.
2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's proposed Order granting conditional collective certification, court-authorized notice, and expedited discovery.
3. Attached hereto as **Exhibit B** are true and correct copies of English and Spanish versions of Plaintiff's proposed Court-Authorized Notice of Lawsuit Regarding Unpaid Wages.

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<sup>1</sup> Plaintiff Freddy Sanchez remains a plaintiff in this matter however based on his job and job duties, he is not part of the collective motion or the collective class of plaintiffs.

4. Attached hereto as **Exhibit C** are true and correct copies of English and Spanish versions of Plaintiff's proposed Reminder Postcard.
5. Attached hereto as **Exhibit D** is a sample of employee work schedules produced by Defendants as pre-mediation disclosures pursuant to the Court's February 3, 2020 Order in FLSA Case (Dkt. No. 10).

Dated: New York, New York  
February 26, 2021

KATZ MELINGER PLLC

By: /s/ Katherine Morales  
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